

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

**B. B., a minor, by and
through his mother and next friend,
OWENA KNOWLES,**

Plaintiff,

v.

**PAWN CITY, INC., INTERSTATE
ARMS CORP., and NORINCO a/k/a
CHINA NORTH INDUSTRIES CORP.,
et al.,**

Defendants.

Case No.: 3:06-cv-00715-MHT

JOINT MOTION FOR SCHEDULING CONFERENCE

COME NOW the plaintiff and defendant China North Industries Corporation (“Norinco”) (collectively “Movants”), and move the Court for a scheduling conference. Movants further request that all deadlines contained in the Uniform Scheduling Order entered on September 11, 2006, be stayed until such scheduling conference takes place. As grounds therefore, the Movants state as follows:

1. On August 4, 2006, Plaintiff filed with the Circuit Court of Chambers County, Alabama, a Motion for Leave to Amend its Complaint to add as a defendant Qiqihar Hawk Industries (“Hawk”), a Chinese corporation that is the manufacturer of the shotgun made the subject of this action.

2. On August 10, 2006, Norinco removed this action to this Court pursuant to 28 U.S.C. § 1441(d).

3. On August 21, 2006, this Court granted Plaintiff's Motion for Leave to Amend its Complaint to add Hawk as a defendant. Attempts to serve Hawk began thereafter.

4. On September 11, 2006, the Court entered a Uniform Scheduling Order.

5. The Movants learned today, March 14, 2007, that Hawk has now retained counsel and will soon enter an appearance in this action.

6. The Movants agree that it is necessary that Hawk be brought into this action as a party and that discovery be had with Hawk prior to any trial of this action.

7. Accordingly, the Movants request that all deadlines in the Uniform Scheduling Order be stayed until such time as all parties, including Hawk, can confer, develop an amended discovery plan to accommodate the joinder of Hawk as a party, and to submit such amended discovery plan to the Court for approval at a scheduling conference.

8. The requested stay would not be prejudicial to any party that has appeared in this action. The requested stay is not meant to cause any undue delay for the Court. Rather, the Movants believe that an adjustment to the Uniform Scheduling Order will save the parties and the Court both time and resources.

WHEREFORE, PREMISES CONSIDERED, plaintiff and defendant China North Industries Corporation pray that this Court will enter an Order staying all deadlines in the Uniform Scheduling Order until such time as a scheduling conference can be held with defendant Qiqihar Hawk Industries.

s/ David J. Hodge

David J. Hodge

One of the attorneys for Plaintiff

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OF COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the above and foregoing with the Clerk of the Court on March 14, 2007, using the CM/ECF system, which will send notification of such filing to the following:

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I hereby further certify that I have mailed by United States Postal Service the above and foregoing to the following non-CM/ECF participants:

Qiqihar Hawk Industries
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s/ Alan D. Mathis
Of Counsel